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UNITED STATES DISTRICT COURT
FOR THE
NORTHERN DISTRICT OF CALIFORNIA

RICARDO TAVARES, JOEL RODRIGUEZ

Plaintiffs,

vs.

DURAN HOGAN CONSTRUCTION, KURT
ROBERT HOGAN SR., RAMON DURAN
JR., SYLVIA GARCIA HOGAN, MARIA
ELENA HOGAN AND DOES 1-10

Defendants

Case No.: C08-1277 HRL

**STIPULATION TO CONTINUE THE
INITIAL CASE MANAGEMENT CASE
CONFERENCE & [PROPOSED] ORDER**

Parties through their counsel stipulate to continue the Initial Case Management Conference currently scheduled for June 24, 2008 as follows:

1. Plaintiffs filed Plaintiffs their Complaint on March 5, 2008.
2. The process was served on Defendants on May 2, 2008.

- 1 3. Thereafter, Plaintiffs' counsel have been contacted by Defendants counsel Mr. Paul
2 Simpson who pointed out certain errors in the Complaint that require the amendment of
3 the Complaint.
- 4 4. On June 9, 2008, Plaintiff filed their First Amended Complaint ("FAC") of course. On
5 the same day, the FAC was served on Mr. Simpson via e-mail. Mr. Simpson
6 acknowledged the service via e-mail, but stated that Defendants' responsive pleading is
7 not due until June 30, 2008.
- 8 5. Therefore, parties respectfully request that the Initial Case Management Conference be
9 currently scheduled for June 24, 2008 be continued to July __, 2008.

10 Dated: June 23, 2008

By: /s/ Adam Wang.
Adam Wang
Attorney for Plaintiffs

11
12 Dated: June 23, 2008

By: /s/ Paul Simpson.
Paul Simpson
Attorney for Defendants

13
14 _____
15 [PROPOSED] ORDER

16 GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the Initial Case
17 Management Conference be continued to July 22, 2008, at 1:30 PM.

18
19 Dated: June __, 2008

By: _____
Howard R. Lloyd